

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X **18-CV-07652 (DLC)**  
LEONIDES DUVERNY,

Plaintiff,

**DECLARATION OF  
JOSHUA FRIEDMAN**

-against-

HERCULES MEDICAL P.C. and HYPERION,  
MEDICAL P.C. and ACHILLES MEDICAL P.C.  
and GEOFFREY RICHSTONE, individually,

Defendants.

-----X

I, **JOSHUA FRIEDMAN**, am an attorney licensed by the State of New York and admitted to practice in the United States District Court of the Southern District of New York, do hereby certify the following:

1. Attached hereto as Exhibit 1 is a true and accurate copy of Plaintiff's Deposition transcript.
2. Attached hereto as Exhibit 2 is a true and accurate copy of Defendant Geoffrey Richstone's Deposition transcript.
3. Attached hereto as Exhibit 3 is a true and accurate copy of text messages exchanged between Plaintiff and Defendants bates stamped Duverny Confidential 000169 to 000176 and 000255 to 000261.
4. Attached hereto as Exhibit 4 is a true and accurate copy of the State of New York Department of Health Determination and Order (No.99-265) of the Hearing Committee in the Matter of Geoffrey Richstone, M.D, bates stamped Duverny Confidential 000040 to 000077.

5. Attached hereto as Exhibit 5 is a true and accurate copy of Charles Kaiser, *Dr. Richstone Guilty of Failing to Report Secretary's Death*, The New York Times, May 23, 1978, at Section B, Page 7, <https://www.nytimes.com/1978/05/23/archives/dr-richstone-guilty-of-failing-to-report-secretarys-death-body-was.html> (last visited Oct 7, 2019).
6. Attached hereto as Exhibit 6 is a true and accurate copy of Defendants Response to Plaintiff's First Set of Interrogatories.
7. Attached hereto as Exhibit 7 is a true and accurate copy of Defendants Response to Plaintiff's First Set of Document Demands.
8. Attached hereto as Exhibit 8 is a true and accurate copy of an email from Lisa Robinson to Leonides Duverny dated May 11, 2016 bates stamped Duverny Confidential 000120.
9. Attached hereto as Exhibit 9 is a true and accurate copy of Employment Information Form submitted by Leonides Duverny to the U.S. Department of Labor Wage and Hour Division bates stamped Duverny Confidential 000281 to 000284.
10. Attached hereto as Exhibit 10 is a true and accurate copy of the EEOC Position Statement submitted by Geoffrey Gladstone bates stamped Duverny Confidential 000001 to 000015.
11. Attached hereto as Exhibit 11 is a true and accurate copy of Entity Information for Hyperion Medical P.C., Achilles Medical, P.C. and Hercules Medical, P.C. from the New York State Department of State.
12. Attached hereto as Exhibit 12 is a true and accurate copy of the Decision and Notice of Decision of the State of New York Unemployment Insurance Appeal Board in the matter of Leonides Duverny, ALJ Case No. 016-14270 (October 26, 2016) bates stamped Duverny Confidential 000116 to 000118.

13. Attached hereto as Exhibit 13 is a true and accurate copy of the decision revoking Defendant Richstone's medical license: In Re Geoffrey Richstone, Petitioner, v. Antonia C. Novello as Commisioner of Health of the State of New York, Respondent, 284 A.D. 2d 737 (3d Dep't 2001)
14. Attached hereto as Exhibit 14 is a true and accurate copy of Department of Labor Complaint filed by Plaintiff dated July 22, 2017.
15. Attached hereto as Exhibit 15 is a true and accurate copy of the Docket from the July 22, 2017 Department of Labor Complaint filed by Plaintiff demonstrating a consent judgment in favor of Plaintiff was entered against Defendant.

Dated: New York, New York  
October 8, 2019

**PHILLIPS & ASSOCIATES,  
ATTORNEYS AT LAW, PLLC**

By: /s/ Joshua M. Friedman  
Joshua Friedman, Esq.  
*Attorneys for Plaintiff*  
45 Broadway, Suite 620  
New York, New York 10006  
(212) 248-7431  
[jfriedman@tpglaws.com](mailto:jfriedman@tpglaws.com)